

[Counsel Listed on Signature Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB

Letter Regarding May 29 Joint Letter

Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

Pursuant to the Court’s May 22, 2025 Order (ECF No. 3059), the Parties submitted a joint letter on May 29, 2025 regarding the scope of Plaintiffs’ Second Set of Interrogatories. (ECF No. 3096.) The Parties are pleased to inform the Court that they have resolved the dispute raised in that letter. The Parties agree that Uber will provide, for each month of 2023 and 2024, the number of incidents Uber categorized into each category of Uber’s Sexual Violence Taxonomy as well as the “Insufficient Information” or “Parent Category Usage Tracking” categories. Uber will provide these numbers in a format consistent with the numbers Uber provided in response to Interrogatories 1 through 6 and will provide this information by June 20, 2025. Plaintiffs understand that Uber intends to include the same or similar caveats as included in its responses to Interrogatories 1 through 6, and may include additional qualifications regarding validation or auditing of the 2023-2024 data.

Respectfully submitted,

DATED: June 2, 2025

By: /s/ Roopal Luhana
ROOPAL P. LUHANA (*Pro Hac Vice*)
CHAFFIN LUHANA LLP
600 Third Avenue, Fl. 12
New York, NY 10016
Telephone: (888) 480-1123
Email: luhana@chaffinluhana.com
Co-Lead Counsel for Plaintiffs

SARAH R. LONDON (SBN 267083)
GIRARD SHARP LLP

By: /s/ Laura Vartain Horn
KIRKLAND & ELLIS LLP
ALLISON M. BROWN
JESSICA DAVIDSON
LAURA VARTAIN HORN

SHOOK, HARDY & BACON L.L.P.
MICHAEL B. SHORTNACY
PATRICK L. OOT, JR.
CHRISTOPHER V. COTTON
ALYCIA A. DEGEN

601 California St., Suite 1400
San Francisco, CA 94108
Telephone: (415) 981-4800
Email: slondon@girardsharp.com

RACHEL B. ABRAMS (SBN 209316)
**PEIFFER WOLF CARR KANE
CONWAY & WISE, LLP**
555 Montgomery Street, Suite 820
San Francisco, CA 94111
Telephone: (415) 426-5641
Email: rabrams@peifferwolf.com

O'MELVENY AND MYERS LLP
SABRINA H. STRONG
JONATHAN SCHNELLER

Attorneys for Defendants
UBER TECHNOLOGIES, INC.,
RASIER, LLC, and RASIER-CA, LLC

ATTESTATION

Pursuant to Civil Local Rule 5-1(h)(3), I hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's consent and have authorized the filing.

Dated: June 2, 2025

By: /s/ Laura Vartain Horn

CERTIFICATE OF SERVICE

I hereby certify that on June 2, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

By: /s/ Laura Vartain Horn